

Exhibit B

**To The Declaration of Benjamin Kleinman
In Support of Kelora Systems, LLC's
Opposition to Defendants' Claim
Construction Brief and Motion
For Summary Judgment of
Invalidity and Non-Infringement**

Appendix B to Kelora's Patent L.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions
Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by Cabela's

I. ACCUSED INSTRUMENTALITY: CABELAS.COM

Claim	Accused Instrumentality
Claim 1	<p>1. A method for assisting a user in identifying a subfamily of items within a family of items said method performed with a server connected to a client computer through a computer network, comprising the steps of:</p> <p>Cabela's performs a method for assisting a user in identifying a subfamily of items within a family of items, the method performed with a server connected to a client computer through a computer network.</p> <p>In particular, for example, Cabela's servers that are connected to clients over the Internet at www.cabelas.com perform the method. In the example screenshots below, the method is used for assisting users in identifying subfamilies of items within families of items, including ammunition, boats, and clothes, among others.</p> 
(a) providing a computer readable data file of stored information representing at least one family of items, said data file identifying at least one alternative for each item,	<p>Cabela's provides via www.cabelas.com a computer readable data file of stored information representing at least one family of items, the data file identifying at least one alternative for each item.</p> <p>As can be seen in the illustrative screenshots, one of the many families of items is Rifle Ammunition. See http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190/Ns-CATEGORY_SEQ_104532480?WTz_I=SBC%3Bcat104792580%3Bcat104691780, reachable from www.cabelas.com by selecting "Shooting", then "Ammunition", and then "Rifle Ammunition".</p>
(b) reading said data file,	<p>Cabela's reads the data file.</p> <p>For example, it does so in the process of serving the page listing Rifle Ammunition at http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190/Ns-CATEGORY_SEQ_104532480?WTz_I=SBC%3Bcat104792580%3Bcat104691780.</p>

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Claim	Accused Instrumentality
(c) displaying a feature screen indicating said alternatives represented in the family,	<p>Cabela's displays a feature screen indicating the alternatives represented in the family.</p> <p>As reflected in the below screenshot, Cabela's displays a feature screen indicating alternatives represented in the family of Rifle Ammunition at http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190/Ns-CATEGORY_SEQ_104532480?WTz_I=SBC%3Bcat104792580%3Bcat104691780. Along the left side of the page is a column listing available alternatives, including at least 4 alternatives for Type, at least 4 for Brand, and 11 for Price, among other alternatives.</p>

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Claim	Accused Instrumentality
(d) accepting a first selection criteria of at least one alternative,	Cabela's accepts a first selection criteria of at least one alternative. For example, a selection criteria corresponding to the ".308 Winchester" alternative under the heading "Type" is accepted by Cabela's at www.cabelas.com . The selection criteria is used in step (e), below.
(e) determining a first subfamily of items wherein each said item in the first subfamily satisfies said first selection criteria,	Cabela's determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria. For example, Cabela's determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria corresponding to the ".308 Winchester" alternative.
(f) determining available alternatives represented in the first subfamily,	Cabela's determines available alternatives represented in the first subfamily. For example, Cabela's determines available alternatives in the first subfamily of Rifle Ammunition satisfying the first selection criteria corresponding to the ".308 Winchester" alternative. The results of the determination are used in step (g), below.

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Claim	Accused Instrumentality
(g) revising said feature screen to indicate the available alternatives of the first subfamily,	<p>Cabela's revises the feature screen to indicate the available alternatives of the first subfamily.</p> <p>For example, Cabela's revises the feature screen to indicate the available alternatives of the first subfamily of Rifle Ammunition, as reflected in the below screenshot of http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190+4294754890/Ne-4294754890/Ns-CATEGORY_SEQ_104532480?WTz_I=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU. The feature screen has been revised. For example, there are now 8 alternatives under Price.</p>

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Claim Chart Regarding Infringement of U.S. Patent 6,275,821 by Cabela's

Claim	Accused Instrumentality
(h) accepting a second selection criteria from said client computer via said computer network at said server wherein the second selection criteria comprises a resubmission to the server of the alternative or alternatives of the first selection criteria plus at least one alternative selected from the revised feature screen,	<p>Cabela's accepts a second selection criteria from the client computer via the computer network at the server wherein the second selection criteria comprises a resubmission to the server of the alternative or alternatives of the first selection criteria plus at least one alternative selected from the revised feature screen.</p> <p>For example, a second selection criteria corresponding to the "\$75 - \$99" alternative under the "Price" heading and the ".308 Winchester" alternative of the first selection criteria is accepted by Cabela's at www.cabelas.com. This second selection criteria is used in step (i), below. This second selection criteria is reflected in the URL below, which includes a "\$75 - \$99" segment (highlighted in yellow), plus a ".308 Winchester" segment (highlighted in Green):</p> <p>http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190+10000050+4294754890/Ne-10000050/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU</p>
(i) determining a second subfamily of items of the family wherein each item in the second subfamily satisfies said second selection criteria,	<p>Cabela's determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria.</p> <p>For example, Cabela's determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria, corresponding to the ".308 Winchester" and "\$75 - \$99" alternatives.</p>
(j) determining available alternatives represented in the second subfamily, and	<p>Cabela's determines available alternatives represented in the second subfamily.</p> <p>For example, Cabela's determines available alternatives represented in the second subfamily satisfying the second selection criteria. The results of the determination are used in step (k), below.</p>

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(k) revising said feature screen to indicate the available alternatives of the second subfamily.	<p>Cabela's revises the feature screen to indicate the available alternatives of the second subfamily.</p> <p>For example, Cabela's revises the feature screen to indicate the available alternatives of the second subfamily, as reflected in the below screenshot of http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190+10000050+4294754890/Ne-10000050/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU. The feature screen has been revised. For example, there are only three available alternatives for "Brand".</p>

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Claim	Accused Instrumentality
Claim 2	<p>2. The method of claim 1 wherein each family has at least one feature associated therewith and further comprising the step of displaying at least one grouping wherein each said grouping comprises one of said features visually related to respective alternatives.</p> <p>Cabela's performs the method of claim 1 (see above) wherein each family has at least one feature associated therewith. For example, each of the families illustrated above includes a "Brand" feature.</p>
	<p>Cabela's displays at least one grouping wherein each grouping comprises one of the features visually related to respective alternatives.</p> <p>For example, as shown in the screenshots above, Cabela's displays a grouping including the "Brand" feature visually related to the alternatives for that feature, such as "Hornady" and other alternatives.</p>

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Claim	Accused Instrumentality
<p>Claim 4</p> <p>4. The method according to claim 2 wherein at least one said groupings is hidden from view if all said respective alternatives are not available.</p>	<p>Cabela's performs the method of claim 2 (see above) wherein at least one grouping is hidden from view if all respective alternatives are not available.</p> <p>For example, Cabela's hides from view the grouping including the "By Customer Rating" feature, which is visible on http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190+4294754890/Ne-4294754890/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU, as shown above, and hidden from view after a second selection criteria reflecting the ".308 Winchester" alternative and the "\$250-\$499" alternative under price is accepted by www.cabelas.com, as can be seen in the screenshot, below, of http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190+10000054+4294754890/Ne-10000054/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU.</p>

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Claim	Accused Instrumentality
Claim 9	<p>9. A method for assisting a user in identifying a subfamily of items within a family of items, the method comprising the following steps which are performed with a server connected to a computer network:</p> <p>Cabela's performs a method for assisting a user in identifying a subfamily of items within a family of items, the method comprising the following steps which are performed with a server connected to a computer network.</p> <p>In particular, for example, Cabela's servers that are accessible over the Internet at www.cabelas.com perform the method. In the example screenshots below, the method is used for assisting users in identifying subfamilies of items within families of items, including ammunition, boats, and clothes, among others.</p> 
(a) providing a computer readable data file of stored information representing at least one family of items, said data file identifying at least one alternative for each item,	<p>Cabela's provides via www.cabelas.com a computer readable data file of stored information representing at least one family of items, the data file identifying at least one alternative for each item.</p> <p>As can be seen in the illustrative screenshots, one of the many families is Rifle Ammunition. See http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190/Ns-CATEGORY_SEQ_104532480?WTz_I=SBC%3Bcat104792580%3Bcat104691780, reachable from www.cabelas.com by selecting "Shooting", then "Ammunition", and then "Rifle Ammunition".</p>
(b) reading said data file,	<p>Cabela's reads the data file.</p> <p>For example, it does so in the process of serving the page listing Rifle Ammunition at http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190/Ns-CATEGORY_SEQ_104532480?WTz_I=SBC%3Bcat104792580%3Bcat104691780.</p>

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Claim	Accused Instrumentality
(c) displaying a feature screen indicating said alternatives represented in the family wherein data is output to a client computer via said computer network,	<p>Cabela's displays a feature screen indicating the alternatives represented in the family wherein data is output to a client computer via the computer network.</p> <p>As reflected in the below screenshot, Cabela's displays a feature screen indicating alternatives represented in the family of Rifle Ammunition at http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190/Ns-CATEGORY_SEQ_104532480?WTz_I=SBC%3Bcat104792580%3Bcat104691780. In so doing, it outputs, via the internet, to a client computer, data. Along the left side of the page is a column listing available alternatives, including at least 4 alternatives for Type, at least 4 for Brand, and 11 for Price, among other alternatives.</p> <p>SHOOTING</p> <p>RIFLE AMMUNITION</p> <p>Showing 1 - 48 of 279 total Items per page: 48 1 2 3 4 5 6 Next</p> <p>Sort by: Recommended COMPARE SELECTED ITEMS UNSELECT ALL</p> <p>Change Currency: USD </p> <p>NARROW BY</p> <p>BY TYPE</p> <ul style="list-style-type: none"> .223 Remington (54) .308 Winchester (41) .300 Winchester Magnum (34) .30-06 Springfield (34) SEE MORE <p>BY BRAND</p> <ul style="list-style-type: none"> Federal (65) Hornady (25) Remington (31) Winchester (43) SEE MORE <p>RELATED CATEGORIES</p> <ul style="list-style-type: none"> Shooting & Reloading DVDs & Videos Shooting & Reloading Books Shooting Vests Shooting Gloves Shooting Shirts Hearing Protection SEE ALSO <p>RECENTLY VIEWED</p> <p>You have no recently viewed items.</p> <p>Cabela's 50TH ANNIVERSARY 50 YEARS 50 TRUCKS SWEEPSTAKES Presented by VISA</p> <p>Sweepstakes Info Commemorative Products Cabela's Heritage</p> <p>18 WINNERS SO FAR 32 TRUCKS TO GO</p> <p>\$15 EARN FREE GEAR</p> <p>APPLY NOW</p>

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Claim	Accused Instrumentality
(d) receiving and accepting a first selection criteria of at least one alternative from said client computer, said first selection criteria being received by said server from said client computer via said computer network,	Cabela's receives and accepts a first selection criteria of at least one alternative from the client computer, the first selection criteria being received by the server from the client computer via the computer network. For example, a first selection criteria corresponding to the ".308 Winchester" alternative under the heading "Type" is received and accepted by Cabela's at www.cabelas.com . The selection criteria is used in step (e), below.
(e) determining a first subfamily of items wherein each said item in the first subfamily satisfies said first selection criteria,	Cabela's determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria. For example, Cabela's determines a first subfamily of items wherein each item in the first subfamily satisfies the first selection criteria corresponding to the ".308 Winchester" alternative.
(f) determining available alternatives represented in the first subfamily,	Cabela's determines available alternatives represented in the first subfamily. For example, Cabela's determines available alternatives in the first subfamily of Rifle Ammunition satisfying the first selection criteria corresponding to the ".308 Winchester" alternative. The results of the determination are used in step (g), below.

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(g) revising said data for said feature screen to indicate the available alternatives of the first subfamily and outputting said revised data for said feature screen to said client computer via said computer network,	<p>Cabela's revises the data for the feature screen to indicate the available alternatives of the first subfamily and outputs the revised data for the feature screen to the client computer via the computer network.</p> <p>For example, Cabela's revises the data for the feature screen to indicate the available alternatives of the first subfamily of Rifle Ammunition and outputs that revised data to the client computer via the Internet, as reflected in the below screenshot of http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_/N-1100190+4294754890/Ne-4294754890/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU. The data for the feature screen has been revised. For example, there are now 8 alternatives under Price.</p> <p>SHOOTING</p> <p>RIFLE AMMUNITION</p> <p>Showing 1 - 41 of 41 total</p> <p>Sort by: Recommended <input type="button" value="COMPARE SELECTED ITEMS"/> <input type="button" value="UNSELECT ALL"/> <input type="button" value="COMPARE ALL"/></p> <p>You Narrowed By: By Type (remove) : .308 Winchester Change Currency: USD </p> <table border="1"> <thead> <tr> <th colspan="2">NARROW BY</th> </tr> <tr> <th colspan="2">BY BRAND</th> </tr> </thead> <tbody> <tr> <td>Federal (6)</td> <td></td> </tr> <tr> <td>Hornady (5)</td> <td></td> </tr> <tr> <td>Remington (5)</td> <td></td> </tr> <tr> <td>Winchester (5)</td> <td></td> </tr> <tr> <td>SEE MORE</td> <td></td> </tr> <tr> <th colspan="2">BY PRICE</th> </tr> <tr> <td>Less than \$30 (22)</td> <td></td> </tr> <tr> <td>\$30 - \$49 (22)</td> <td><input type="button" value="COMPARE"/></td> </tr> <tr> <td>\$50 - \$74 (10)</td> <td><input type="button" value="COMPARE"/></td> </tr> <tr> <td>\$75 - \$99 (4)</td> <td><input type="button" value="COMPARE"/></td> </tr> <tr> <td>\$100 - \$149 (4)</td> <td><input type="button" value="COMPARE"/></td> </tr> <tr> <td>\$150 - \$199 (4)</td> <td><input type="button" value="COMPARE"/></td> </tr> <tr> <td>\$200 - \$249 (2)</td> <td><input type="button" value="COMPARE"/></td> </tr> <tr> <td>\$250 - \$499 (2)</td> <td><input type="button" value="COMPARE"/></td> </tr> <tr> <th colspan="2">RELATED CATEGORIES</th> </tr> <tr> <td> <ul style="list-style-type: none"> • Shooting & Reloading DVDs & Videos • Shooting & Reloading Books • Shooting Vests • Shooting Gloves • Shooting Shirts • Hearing Protection </td> <td> <p>RECENTLY VIEWED</p> <p>You have no recently viewed items.</p> <p>Cabela's 50TH ANNIVERSARY SWEEPSTAKES Presented by </p> <p>Sweepstakes Info Commemorative Products Cabela's Heritage</p> <p>18 WINNERS SO FAR 32 TO GO</p> <p>\$15 FREE GEAR</p> <p> APPLY NOW</p> </td> </tr> </tbody> </table>	NARROW BY		BY BRAND		Federal (6)		Hornady (5)		Remington (5)		Winchester (5)		SEE MORE		BY PRICE		Less than \$30 (22)		\$30 - \$49 (22)	<input type="button" value="COMPARE"/>	\$50 - \$74 (10)	<input type="button" value="COMPARE"/>	\$75 - \$99 (4)	<input type="button" value="COMPARE"/>	\$100 - \$149 (4)	<input type="button" value="COMPARE"/>	\$150 - \$199 (4)	<input type="button" value="COMPARE"/>	\$200 - \$249 (2)	<input type="button" value="COMPARE"/>	\$250 - \$499 (2)	<input type="button" value="COMPARE"/>	RELATED CATEGORIES		<ul style="list-style-type: none"> • Shooting & Reloading DVDs & Videos • Shooting & Reloading Books • Shooting Vests • Shooting Gloves • Shooting Shirts • Hearing Protection 	<p>RECENTLY VIEWED</p> <p>You have no recently viewed items.</p> <p>Cabela's 50TH ANNIVERSARY SWEEPSTAKES Presented by </p> <p>Sweepstakes Info Commemorative Products Cabela's Heritage</p> <p>18 WINNERS SO FAR 32 TO GO</p> <p>\$15 FREE GEAR</p> <p> APPLY NOW</p>
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(h) receiving and accepting a second selection criteria from said client computer via said computer network, in which said second selection criteria comprises (1) a resubmission by said client computer of the alternative or alternatives of the first selection criteria along with (2) at least one alternative selected from the revised feature screen,	<p>Cabela's receives and accepts a second selection criteria from the client computer via the computer network, in which the second selection criteria comprises (1) a resubmission by the client computer of the alternative or alternatives of the first selection criteria along with (2) at least one alternative selected from the revised feature screen.</p> <p>For example, a second selection criteria corresponding to the "\$75 - \$99" alternative under the "Price" heading and the ".308 Winchester" alternative of the first selection criteria is received and accepted by Cabela's at www.cabelas.com. This second selection criteria is used in step (i), below. This second selection criteria is reflected in the URL below, which includes a "\$75 - \$99" segment (highlighted in yellow), plus a ".308 Winchester" segment (highlighted in Green):</p> <p>http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190+10000050+4294754890/Ne-10000050/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU</p>
(i) determining a second subfamily of items of the family wherein each item in the second subfamily satisfies said second selection criteria,	<p>Cabela's determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria.</p> <p>For example, Cabela's determines a second subfamily of items of the family wherein each item in the second subfamily satisfies the second selection criteria, corresponding to the ".308 Winchester" and "\$75 - \$99" alternatives.</p>
(j) determining available alternatives represented in the second subfamily, and	<p>Cabela's determines available alternatives represented in the second subfamily.</p> <p>For example, Cabela's determines available alternatives represented in the second subfamily satisfying the second selection criteria. The results of the determination are used in step (k), below.</p>

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(k) revising said data for said feature screen to indicate the available alternatives of the second subfamily and outputting said revised data for said feature screen to said client computer via said computer network.	<p>Cabela's revises the data for the feature screen to indicate the available alternatives of the second subfamily and outputs the revised data for the feature screen to the client computer via the computer network.</p> <p>For example, Cabela's revises the data for the feature screen to indicate the available alternatives of the second subfamily, as reflected in the below screenshot of http://www.cabelas.com/catalog/browse/shooting-ammunition-rifle-ammunition/_N-1100190+10000050+4294754890/Ne-10000050/Ns-CATEGORY_SEQ_104532480?WTz_l=SBC%3Bcat104792580%3Bcat104691780&WTz_st=GuidedNav&WTz_stype=GNU. The data has been revised. For example, there are only three available alternatives for "Brand". The data is output to the client computer via the Internet.</p>

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